

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,

-against-

GOOGLE LLC,

Defendant.

No. 1:19-cv-08655 (LGS)(GWG)

**DEFENDANT GOOGLE LLC'S
NOTICE OF MOTION FOR
SUMMARY JUDGMENT**

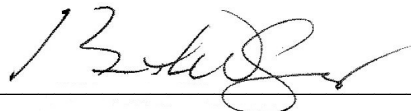
Oral Argument Requested

Pursuant to Federal Rule of Civil Procedure 56, Defendant Google LLC ("Google") by and through its undersigned counsel, hereby moves this Court for an Order granting Google's Motion for Summary Judgment (the "Motion") for the reasons identified in the accompanying Memorandum of Law in Support of Its Motion, Declaration of Will Grannis, Declaration of Kevin Lucas and Exhibits, Declaration of Chris Humez, and Declaration of Sara B. Tomezsko and Exhibits, and Statement of Undisputed Material Facts, which are incorporated by reference herein.

WHEREFORE, Google respectfully requests that the Court grant Google's Motion and enter an Order dismissing Plaintiff Ulku Rowe's Amended Complaint (ECF No. 12).

Dated: New Canaan, Connecticut
November 1, 2021

PAUL HASTINGS LLP



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GOOGLE LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this 1st day of November 2021, I caused a true and exact copy of the foregoing DEFENDANT GOOGLE LLC'S MOTION FOR SUMMARY JUDGMENT and all supporting documents to be filed electronically and served by mail on anyone unable to accept electronic filing. Notice and copies of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

Dated: Jersey City, New Jersey
November 1, 2021

A handwritten signature in black ink, appearing to read 'SBE', is written over a horizontal line.

Sara B. Tomezsko